

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

RECEIVED
JUL 6 '98

FEDERAL COMMUNICATIONS
COMMISSION
OFFICE OF THE SECRETARY

Received

JUN 12 1998

In the Matter of)

Waiver Petition of Virgin Islands)
Telephone Corporation)

Common Carrier Bureau
Network Service Division
Office of the Chief

File No.

Docket 92-237

**PETITION OF VITELCO FOR EXTENSION OF WAIVER OF THE COMMISSION'S
RULES REGARDING TRANSITION TO FOUR-DIGIT CICs**

Gregory J. Vogt
Bryan N. Tramont
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7000

Attorneys for Virgin Islands Telephone
Corporation

June 12, 1998

TABLE OF CONTENTS

	<u>Page</u>
I. BACKGROUND	2
II. VITELCO'S WAIVER PRESENTS GOOD CAUSE FOR EXTENDING ITS TRANSITION PERIOD UNTIL IT CAN FULLY COMPLETE ITS UPGRADES BY DECEMBER 1999.....	4
A. Because of the Lack of Available Equipment and the Nature of the Work to be Performed, a Solution Guaranteeing Compliance Cannot Be Deployed By Vitelco Prior to Its Current June 30 th Deadline.....	5
B. Vitelco Has Moved as Vigorously and as Quickly as Possible to Deploy Equipment Capable of Satisfying the Commission's Directives.....	9
C. Due to the Small Numbers of IXC's Serving Vitelco's Customers, the Impact of an Extension on Its Customers Will Not Outweigh the Burden on Vitelco if the Waiver is Denied.....	11
III. CONCLUSION.....	13

SUMMARY

Pursuant to 47 C.F.R. § 1.3, the Virgin Islands Telephone Corporation ("Vitelco") respectfully requests an extension of its waiver of the Commission's requirement that local exchange carriers' switches accept only four-digit Carrier Identification Codes (CICs) by June 30, 1998. Until April 1, Vitelco believed it was fully prepared to comply with the Commission's deadline and was simply awaiting a formal upgrade proposal from its switch manufacturer, Alcatel. On that date, however, Vitelco learned that Alcatel wanted nearly \$1 million for an upgrade it would not guarantee would comply with the new CIC rules and would not update the switches so that they could accommodate other numbering changes.

After evaluating the options, Vitelco rejected Alcatel's "solution" and opted to replace its two main switches and seventeen remotes with equipment from Nortel that would not only comply with the new CIC requirements, but would permit Vitelco to satisfy other upcoming numbering rules, such as local number portability. However, due to the backlog at Nortel and the time it takes to replace switches and associated remotes, the equipment Vitelco needs to comply with the new CIC requirements is essentially unavailable before June 30, 1998.

Even so, Vitelco is committed to expedite the implementation process as quickly as possible and to minimize the delay in bringing four-digit CIC **capability to its customers**. Vitelco has designed **the implementation schedule** so that as switches and remotes are replaced customers will be able to use four-digit CICs. In addition, the phase-in is structured to bring this service to the greatest number of customers at the beginning of the deployment. In fact, the speed at which Vitelco is moving is underscored by the time that the Commission has given other similarly-sized carriers to deploy new switches, up to four years in one case, whereas

Vitelco anticipates it will fully complete deployment within eighteen months, with the bulk of deployment completed within twelve.

Finally, an extension will not be detrimental to long distance carriers ("IXCs") or consumers. Due to a variety of technological, geographic, and economic factors associated with the Virgin Islands, a limited number of IXCs serve this island market and no IXC has requested four-digit CICs from Vitelco. In light of these facts, this delay is unlikely to have any practical impact on the Virgin Island consumer.

Vitelco requests that the Commission waive its current CIC deadline until December 1999, the date by which Vitelco expects to complete its phased-in deployment of the new switches and remotes. In light of Vitelco's efforts to comply as quickly as possible with the new CIC rules, the impact of the delay by Alcatel and the backlog at Nortel, the time Vitelco needs to undertake such a massive replacement of equipment, and the efforts by Vitelco to ameliorate any harm to consumers, the grant of a waiver is consistent with the public interest. Therefore, Vitelco respectfully requests the Commission grant its request for a waiver.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

)	
In the Matter of)	
)	
Waiver Petition of Virgin Islands)	File No.
Telephone Corporation)	
)	
)	

To: The Commission

**PETITION OF VITELCO FOR EXTENSION OF WAIVER OF THE COMMISSION'S
RULES REGARDING TRANSITION TO FOUR-DIGIT CICs**

Pursuant to 47 C.F.R. § 1.3, the Virgin Islands Telephone Corporation ("Vitelco") through its counsel, respectfully requests an extension of its waiver of the Commission's requirement that local exchange carriers' ("LECs") switches accept only four-digit Carrier Identification Codes ("CICs") by June 30, 1998.¹ Although Vitelco worked concertedly with Alcatel, the manufacturer of its primary switches, to complete the conversion before its current waiver expires, Alcatel was not able to guarantee that the modifications it proposes to make to Vitelco's switches will comply with the Commission's requirements. As a result, Vitelco must now replace or upgrade all of its switches with new equipment and software that will have the capability of supporting the new CIC and CAC standards, as well as other upcoming FCC

¹ This requirement was most recently set forth in Administration of the North American Numbering Plan, Carrier Identification Codes, 12 FCC Rcd 17876 (Order on Reconsideration) (1997) ("*Order on Recon.*"). Vitelco received a waiver of that date, extending its compliance deadline to June 30, 1998. See Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, NSD File Nos. 97-63 to -76, 97-78, Order, DA 97-2691, at ¶ 56 (rel. Dec. 24, 1997) ("*Third CIC Waiver Order*").

requirements, such as number portability. This replacement takes time due to significant delays in switch delivery times quoted by Nortel, and the time it takes to complete the massive conversion processes for these switches and remote nodes and to test the equipment to avoid customer service disruption.

Given these facts, Vitelco respectfully requests an extension of its conversion deadline until it can complete the replacement of its switches and remotes in accordance with a phased-in switch deployment that will be completed by December 1999, with the understanding that as equipment is deployed, customers will obtain four-digit CIC capability on a rolling basis. In light of Vitelco's good faith efforts to expeditiously complete its conversion, the significant amount of time that is required for such a massive replacement of equipment, and the fact that such extension will not harm consumers or competition, this request is therefore consistent with the public interest, and the Commission should grant Vitelco's request for waiver.

I. BACKGROUND

Vitelco is a rural and insular telephone company operating in the U.S. Virgin Islands with approximately 62,000 switched access lines spread over multiple islands.² Vitelco currently operates three switches: two Alcatel-1210s and one Nortel DMS-100. The Alcatel switches were purchased in 1981; the DMS dates from 1988. While Vitelco had planned on making the transition to four-digit CICs by 2000 as proposed in the Commission's 1994 North American

² The factual statements made in this waiver petition were verified by Emiel Michiels, Vitelco's Vice President of Planning and Engineering. An affidavit attesting to these facts was delayed and not available for filing but will be filed with the Commission as soon as it is available.

Numbering Plan NPRM,³ the company was not prepared for the Commission's final decision to end the transition on January 1, 1998.⁴

In reaching its decision to accelerate the transition, the Commission understandably sought information from the two largest equipment manufacturers: Nortel and Lucent.⁵ These manufacturers indicated that the technology had been commercially available for at least two or three years.⁶ To the Commission this indicated that the necessary technology had been available for a period of time sufficient to warrant shortening the transition period.⁷ The Commission did not specifically report this information from Vitelco's primary switch manufacturer – Alcatel. Although other Alcatel software packages have had four-digit CIC upgrades available for up to two years, Alcatel's General Software Module 301.2 in use by Vitelco has never had such an upgrade available.

Nevertheless, even before the Commission's Order was released, Vitelco began to gather information from Alcatel about the feasibility of implementing the mandatory four-digit CIC transition by January 1. Those consultations led Vitelco to the inescapable conclusion that such

³ See *Administration of the North American Numbering Plan*, 9 FCC Rcd 2068, 2076-77 (1994) (Notice of Proposed Rulemaking) (proposing a six year transition period).

⁴ *Order on Recon.* at 17892.

⁵ *Administration of the North American Numbering Plan, Carrier Identification Codes*, 12 FCC Rcd 8024, 8046-47 (Second Report and Order) (1997), *recon. pending* ("Second Report & Order").

⁶ *Id.*

⁷ *Id.* at 8049.

implementation was not feasible by the January 1, 1998 deadline.⁸ As a result, Vitelco sought and received a waiver from the Commission of the four-digit CIC requirement until June 30, 1998.⁹ Now, despite Vitelco's concerted efforts to comply with the June 30th deadline (as detailed below), such a deployment is no longer feasible and Vitelco respectfully requests an extension of its current waiver so that it can deploy new equipment to comply with the four-digit CIC rule.

II. VITELCO'S WAIVER PRESENTS GOOD CAUSE FOR EXTENDING ITS TRANSITION PERIOD UNTIL IT CAN FULLY COMPLETE ITS UPGRADES BY DECEMBER 1999.

Under Section 1.3, the Commission's rules may be waived when there is "good cause shown."¹⁰ The FCC may exercise its discretion to waive a rule where particular facts would make strict compliance inconsistent with the public interest.¹¹ Where special circumstances warrant a deviation from the general rule and such deviation will serve the public interest, a waiver is an appropriate course of action.¹²

In its review of waiver requests seeking extensions of the conversion deadline, the Commission has weighed the following three factors: the impact of the availability of products

⁸ Nortel provided its upgrade proposal to the DMS-100 in a timely fashion. However, such a conversion would have no effect without the conversion of the Alcatel-1210 main tandem switch located on St. Thomas. The Alcatel-1210 is central to the conversion to four-digit CICs because all interexchange traffic to and from the islands must pass through this switch.

⁹ *Third CIC Waiver Order* at ¶ 56.

¹⁰ 47 C.F.R. § 1.3.

¹¹ See *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

¹² *Northeast Cellular*, 897 F.2d at 1166.

needed to accomplish the upgrade on the carrier's ability to meet the deadline; a carrier's diligence in attempting to upgrade its switches within the authorized timeframe; and the impact of an extension on the interexchange carriers ("IXCs") served by the carrier and on "customers' ability to reach IXCs through CAC dialing."¹³ Vitelco presents compelling special circumstances that warrant a waiver of the Commission's rules by an extension of its conversion deadline of June 1998 to phase-in complete conversion by December 1999.

A. Because of the Lack of Available Equipment and the Nature of the Work to be Performed, a Solution Guaranteeing Compliance Cannot Be Deployed By Vitelco Prior to Its Current June 30th Deadline

Conversion to a four-digit CIC is not feasible for Vitelco by June 30, 1998. Put simply, given the inability of Alcatel, Vitelco's primary equipment vendor, to provide a guaranteed solution, and the lack of immediately available equipment from Nortel, Vitelco's new equipment vendor, Vitelco cannot complete the work needed to guarantee compliance with the FCC's requirements prior to June 30, 1998.

Currently, Vitelco's main tandem switch is an older, 1981-vintage Alcatel 1210.¹⁴ In its preliminary discussions with Alcatel, Vitelco learned that, in order to implement four-digit CICs, the Alcatel 1210 would need *both* hardware and software upgrades. The upgrade was complicated by the fact that the Alcatel 1210 has been discontinued by the manufacturer. Thus, before a compliant version of the software upgrade could be installed, the parts required to upgrade the hardware would either need to be located on the secondary market and modified, or

¹³ See, e.g., *Third CIC Waiver Order* at ¶ 28.

¹⁴ Vitelco has two such switches. The main switch through which all interstate traffic passes is located on the island of St. Thomas. The second switch is on the island of St. Croix.

removed from Vitelco's switch and modified. An additional complicating factor is that the switch is currently operating at near capacity so that an additional software expansion might cause an increased frequency of restarts on the switch which would require Vitelco to offload traffic to other system switches to reduce this risk.

After months of repeated inquiries and attempts to obtain a written quotation setting out the terms of the conversion and the determination of a reasonable target date for completion,¹⁵ Alcatel finally provided the required information on April 1, 1998 – only three months before the compliance deadline. The news was not good. First, Alcatel priced the hardware and software upgrades at around \$884,000 for both of Vitelco's 1210s, which amounts to nearly \$15 per access line. Considering the fact that both switches together are only currently valued at just under \$3.3 million, this figure, representing nearly one-third of the 1210s current value, was considerably higher than Vitelco expected. Second, Alcatel stated that this upgrade would do no more than meet the new CIC and CAC standards. That is, the upgrade would not actually update the switches technologically so that they could be easily modified to conform with new Commission requirements, such as number portability. Finally, Alcatel told Vitelco that it would neither warrant nor guarantee that its upgrades to the 1210s would actually enable the switch to handle four-digit CICs and seven digit CACs.¹⁶ As illustrated by these facts, it would be grossly

¹⁵ The vast majority of the discussions between Vitelco and Alcatel have taken place by phone. Written requests for additional information are appended as Attachment 1.

¹⁶ In fact, Alcatel all but told Vitelco that it did not believe the upgrades would perform at all and stressed that it made "**NO WARRANTY** regarding the performance of the GSM 304 hardware and software on the 1210 switch owned by VITELCO." Letter from Roy D. Todd, Senior Contract Manager, Alcatel Sys. Int'l, to Emiel Michiels, V.P., Engineering and Planning, Vitelco (Apr. 1, 1998) (emphasis in original).

inefficient for Vitelco to pay nearly \$1 million for upgrades that still would not clearly bring Vitelco into compliance with the Commission's regulations.

Another possible option would be to hire a third party to perform the necessary upgrades. Unfortunately for Vitelco, this option is not available. Under existing licensing agreements, the only company authorized to perform the work necessary to convert the switch is Alcatel. The only other solution was to replace the switches, which Vitelco decided to do on or about June 1, 1998.

Not surprisingly, this final option is time-consuming. In order to fully implement the upgrade, Vitelco will need to replace its two 1210s and their associated individual remote units. Even though Vitelco has begun the ordering process to obtain the new equipment from Nortel, it has been told that, due to demand, the first switch is not scheduled for delivery until the first of October – at the earliest. This alone puts Vitelco well past the June deadline and does not account for the replacement for the second 1210 and the seventeen other remotes. Once delivered, the actual procedure of replacing switches is a slow process. Vitelco will need to transfer 62,000 access lines and integrate nineteen different switches and remotes – a process that must be done manually. Once the equipment is installed, Vitelco must test it in order to work out any kinks and bugs from the new system. Each of these steps takes time and is fraught with potential problems and delays. Care must be taken to avoid any customer service disruptions.

And then there is the nature of Vitelco's service area which introduces additional factors not typically found in the continental United States. Vitelco's service territory is exclusively comprised of several islands separated by miles of ocean. So, for example, where it is typical in the mainland United States for switches to be delivered by truck, Vitelco must also transport its switches between island by boat. Further, because of the hostile environment created by the

island's subtropical climate and corrosive sea air, the reconfiguration of equipment buildings with new power and air conditioning must take place prior to installation. The nature of the service area also affects the structure of the switching system Vitelco must use to provide common carrier services in its territory. To provide service, Vitelco relies heavily upon remote switches to handle many vital switching functions. Thus, in order to provide four-digit CIC capability to its customers, not only must the new main switch be upgraded, but its associated remotes must be upgraded as well. Further, in order to minimize the risk of disrupting service to its customers, Vitelco and Nortel must phase in the deployment of this new equipment.

Accounting for all of these factors, all of the work required to upgrade Vitelco's entire system will not be complete until 1999. Nevertheless, Vitelco is committed to deploying this new equipment in as expedient a manner as possible. In fact, the period of time that Vitelco is taking to deploy this system is considerably shorter than the waiver of more than four years that the Commission granted a similarly sized LEC on the mainland of the United States to swap out its switches when converting to equal access.¹⁷ To speed the deployment of capabilities to customers, Vitelco will start the process beginning with the main tandem switch on St. Thomas, through which all interexchange traffic passes, and its seven associated remotes. At this point, those customers serviced by this switch will be able use seven-digit CACs. Then, after this switch is up and running, then the second 1210 located on St. Croix and its ten associated remotes will be replaced. Again, as remotes are installed, customers will have the desired capabilities. By proceeding in such a manner, Vitelco will be able to phase in four-digit CIC

¹⁷ See *Illinois Consolidated Telephone Co.*, 6 FCC Rcd 6648, 6649 (1991) (granting waivers of 4 years and 8 months, and 3 years and 8 months to small carriers for switch replacement).

dialing to the greatest number of customers as early as it possibly can in the deployment process.¹⁸

The Commission has often held in other contexts that technical infeasibility and the lack of available equipment provides a sound basis to grant a waiver petition to install new switching equipment.¹⁹ Further, the fact that Alcatel's proposed "solution" would not permit Vitelco to fulfill other numbering obligations has also been found to justify a waiver.²⁰ Therefore, in light of the totality of these "special circumstances" and the Commission's own recognition that such delays were possible, if not probable, Vitelco should be granted an extension of the conversion deadline in order to resolve the special case in which it finds itself. Such a "deviation from the general rule" is warranted by the "special circumstances" created by these issues.²¹

B. Vitelco Has Moved as Vigorously and as Quickly as Possible to Deploy Equipment Capable of Satisfying the Commission's Directives

A waiver is also warranted because Vitelco has made – and continues to make – concerted, good faith efforts to comply with the Commission's directives. Even before its

¹⁸ See Attachment 2 (Deployment Schedule).

¹⁹ See *Illinois Consolidated*, 6 FCC Rcd at 6649 (waiving equal access rules based on delays caused by technical difficulties with switch manufacturer); *Rules and Policies Regarding Calling Number Identification Service – Caller ID*, 11 FCC Rcd 17454 (1996) (waiving Caller ID requirements due to vendor delays in proposing switch upgrade); Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, NSD File Nos. 97-46 to 51, 53 to 56, *Order*, DA 97-2528, at ¶ 27 (rel. Dec. 3, 1997) (*First CIC Waiver Order*) (citing Nortel's backlog as good cause); *Third CIC Waiver Order* at ¶ 27 (same).

²⁰ See *MoKan Dial, Inc. Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule*, NSD File No. 97-87, *Order*, DA 98-29, at ¶ 7 (rel. Jan. 8, 1998) (noting that it is more practicable, economic and efficient to upgrade to accommodate CIC and other numbering changes, like local number portability).

²¹ *Northeast Cellular*, 897 F.2d at 1166.

obligation became fixed, Vitelco made inquiries of both Nortel (for the DMS 100) and Alcatel (for the Alcatel-1210s) to determine the costs and timing of a transition to a four digit CIC.²² Indeed in its telephone conversations with Alcatel, Vitelco repeatedly stressed the need to develop solutions to 4-digit CIC implementation as soon as possible. Yet, despite Vitelco's continual pressure, Alcatel did not provide any definitive information regarding the timing, procedure and the cost of upgrading Vitelco's switches until April 1, 1998. In effect, Vitelco has only recently had the necessary information to fully analyze its compliance options.

Even so, Vitelco has acted in a quick and decisive manner on this information. Upon receipt of Alcatel's proposed "solution," the engineering department at Vitelco analyzed the proposal as quickly as possible and compared it to a wholesale replacement of Vitelco's switches. After deciding to recommend the upgrade on technical grounds, the economics of the replacement option was examined to consider the effect of expending over \$13 million to upgrade the switches. In short, given the importance and nature of the decision Vitelco would need to make – implement a quick "fix" or revamp its entire switching system – Vitelco took less than eight weeks to decide to change course, approve a \$13 million expenditure, and take decisive action to implement the Commission's requirements.

Once the company decided to replace the switches, Vitelco has been moving as quickly as it possibly can to deploy this new equipment. Vitelco has already contacted Nortel and has determined what equipment it will need. The company has placed orders with Nortel for the

²² In fact, even before events forced it to reconsider its decision to upgrade the Alcatel switches, Vitelco also considered changing out the switch entirely in order to comply with the Commission's Order. However, at the time Vitelco ruled out this option because the process of replacing the main switches plus the 17 remote switches without service disruption would not have been possible before the Commission's deadlines.

switches, support equipment and necessary software. As discussed in the previous section, a schedule detailing the steps and timelines for the deployment of this equipment has been devised to deploy the equipment as quickly as practical without disrupting service to Vitelco's customers. Engineers and architects have been contacted to determine if existing support structures need reconfiguration for the new equipment.

In short, Vitelco has done everything within its control to speed the deployment of this equipment. Its actions are fully consistent with those the Commission has found to demonstrate a carrier is "diligently working" to comply with the new CIC requirements.²³ What Vitelco needs now is a reasonable time to do so.

C. Due to the Small Numbers of IXC's Serving Vitelco's Customers, the Impact of an Extension on Its Customers Will Not Outweigh the Burden on Vitelco if the Waiver is Denied

Finally, an extension in the deployment schedule for four-digit CICs in the Virgin Islands will not be detrimental to IXCs or customers and is therefore consistent with the public interest. Over the past four years only seven IXCs have sought to operate in the Virgin Islands²⁴ and no requests for four-digit CICs have been made. Vitelco itself **does not provide interstate, interexchange services**. A variety of technological, geographic, and economic factors – **having** nothing to do with Vitelco – have limited the number of IXCs serving this island market. In light of the limited IXC participation, this delay is unlikely to have any practical impact on the Virgin

²³ See, e.g., *Third CIC Waiver Order* at ¶ 40; Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, 12 FCC Rcd 21794, 21808 (Order) (1997) (*Second CIC Waiver Order*).

²⁴ AT&T, MCI, Sprint, TLD, WorldCom (subsequently withdrawn from the market), TresCom and VI Telecom (VI Telecom subsequently sold its interests to TresCom).

Island consumer. This is important because the potentially negative effect on competition of excluding four-digit CIC holders was a primary motivation for the Commission's decision to accelerate the transition period from the original six-year proposal to the two year and nine months ending on January 1, 1998.²⁵ That factor appears to be absent here.

As discussed above, Vitelco has designed its implementation schedule with an eye towards bringing four-digit CIC capability to the greatest number of customers in the earliest possible timeframe. Vitelco will upgrade the switching system associated with the switch located on the island of St. Thomas first, which is where all interstate traffic enters the islands. By doing so, Vitelco will be able to phase in four-digit CIC capability to the bulk of its customers before the end of this year as it becomes available. After the work on St. Thomas is complete, Vitelco will then move to the system associated with the switch on St. Croix. Again, after the main switch is installed and as remotes are added, increasing numbers of customers will have four-digit CIC capability. The result will be to minimize the impact of the delay on the greatest number of customers.

In addition, Vitelco is willing to use additional measures proposed by the Commission to notify its customers of the delay in the implementation of the new CIC codes. First, Vitelco is willing to work with IXC's to devise specific language to be used in intercept messages that will indicate to customers the effect of the delay in the deployment of four-digit CICs. Further, a similar notification will be provided in bill inserts to customers. These additional educational

²⁵ *Order on Recon.* at 17888.

measures are ones that the Commission has stated will "help minimize disruption to the IXC's served" by Vitelco, and "to those IXC's customers trying to reach them by CAC dialing."²⁶

Not only will the waiver not harm consumers, but the additional time used in deploying new equipment will result in added benefits for consumers. The new switches will give Vitelco the capability to implement upcoming Commission requirements, such as local number portability. Further, this new equipment will, for the first time, give Vitelco SS7 capability and other attendant benefits, such as call waiting, phone mail, and call forwarding, among others.

In short, any impact on long distance carriers and Vitelco's customers will be minimal due to the unique characteristics of the Virgin Islands telecommunications market. However, the burden on Vitelco imposed by a reckless push for deployment would be great and would work to the detriment of the quality of service enjoyed by its ratepayers.

III. CONCLUSION

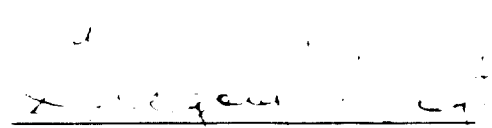
Vitelco has demonstrated the special circumstances that merit a waiver of its current deadline of June 30, 1998. And, as the foregoing demonstrates, it is clearly in the public interest for the Commission to extend Vitelco's transition period for four-digit CICs extended to

²⁶

See Second CIC Waiver Order at 21809.

December 1999. During this period, Vitelco will continue to diligently pursue compliance with the Commission's orders.

Respectfully submitted,



Gregory J. Vogt
Bryan N. Tramont
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7000

Attorneys for Virgin Islands Telephone
Corporation

June 12, 1998

ATTACHMENT 1

Virgin Islands Telephone Corporation
P.O. Box 6100, St. Thomas
U.S. Virgin Islands 00804-6100

October 08, 1997

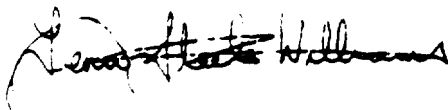
Jerry Johnston
Technical Support Specialist
Alcatel Network Systems
Technical Services
2912 Wake Forest Road
Raleigh, NC 27609

Dear Mr. Johnston:

The response to the attached request was a verbal quote of \$220,000 for St. Thomas and \$200,000 for St. Croix.

In order to finalize our plans, we are now requesting a firm written quotation for 4-digit CIC implementation on the 1210.

Sincerely,



Lena Steele Williams
Central Office Engineer

cc: [illegible]

1



To: John Johnson
From: Lena Steele Williams
Date: Friday, September 6, 1996
Subject: 4 digit CIC Quotation

Per our discussion, we need the software and hardware requirements for supporting 4 digit carrier identification codes on the 1210 switches in St. Thomas and St. Croix.

Please provide a quotation for GSM 304 and any other requirement.

xc:

Emiel Michiels

ATTACHMENT 2

VITELCO NETWORK MODERNIZATION ESTIMATED IMPLEMENTATION SCHEDULE

